

## PHYSICAL THERAPY BOARD OF CALIFORNIA Consumer Protection Services Program

1418 HOWE AVENUE, SUITE 16, SACRAMENTO, CA 95825-3204
TELEPHONE (916) 561-8200 FAX (916) 263-2560 TOLL FREE 1-800-832-2251
INTERNET http://www.ptb.ca.gov
EMAIL cps@dca.ca.gov

June 11, 2003

Kaveh Soodjani, PT Temple Community Hospital 235 N. Hoover Street Los Angeles, CA 90004 Citation No. 02-03-0033

License No. PT <u>10565</u>

#### **CITATION**

Investigation of a recently submitted complaint has revealed actions taken by you which violate sections of the law regulating the practice of physical therapy.

It was determined that on or about July 26, 2002, proper supervision of Orang Amintowlieh was not provided. Mr. Amintowlieh was found practicing physical therapy at Burbank Center for Therapy autonomously which is a violation of the Physical Therapy Practice Act. It was further determined that Mr. Amintowlieh was functioning as a Physical Therapist License Applicant under your supervision; however, Mr. Amintowlieh was not authorized by the Board to practice as a Physical Therapist License Applicant as of that date.

Therefore, a citation is hereby issued to you in accordance with Section 125.9 of the Business and Professions Code for the violations described below.

#### FIRST CAUSE FOR CITATION

1. Business and Professions Code 2660 (j) Aiding and abetting a violation of the Physical Therapy Practice Act

#### SECOND CAUSE FOR CITATION

2. Business and Professions Code 2660 (k) Aiding and Abetting the unlawful practice of physical therapy.

Kaveh Soodjani, PT Page Two

#### **ORDER**

Further, **you are ordered to pay a fine of \$1,500** to the Physical Therapy Board of California within 30 days after receipt of this Citation.

If you wish to contest all or any part of this Citation, complete the enclosed "Notice of Appeal -Request for Informal Conference" form and return it to this office within 10 days after receipt of this Citation. The date indicated on the order of abatement will be held in abeyance <u>only</u> for any violation(s) you wish to contest. The time to correct all uncontested violations will be adhered to as specified. In the alternative, you may, within 30 days after receipt of this Citation, request a <u>formal</u> administrative hearing before an administrative law judge under the Administrative Procedure Act.

FAILURE TO RETURN THE REQUEST FOR INFORMAL CONFERENCE FORM OR TO REQUEST AN ADMINISTRATIVE HEARING WITHIN THE TIMES INDICATED WILL WAIVE YOUR RIGHT TO ADMINISTRATIVELY CONTEST OR APPEAL THIS CITATION.

Administrative Fine

\$ 1500.00

FOR YOUR PROTECTION AND TO ASSURE PROPER CREDIT,
PLEASE RETURN THE COPY OF THE CITATION
AND NOTE THE CITATION NUMBER ON YOUR CHECK
OR MONEY ORDER.

Date	<del>-</del>
	Original Signed Byy
	<u>Original Signed By:</u> STEVEN K. HARTZELL
	Executive Officer



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#### ORDER OF ABATEMENT

June 11, 2003

Citation Against: Kaveh Soodjani, PT	Citation No. 02-03-0033
<u>Item No. 1 &amp; 2</u>	
Violations: Business and Professions Code Section _	2660 (j)(k) .
1. Business and Professions Code 2660 (j) Aiding and abetting a violation of the Physica	l Therapy Practice Act

2. Business and Professions Code 2660 (k) Aiding and Abetting the unlawful practice of physical therapy.

### Order of Correction

You are hereby ordered to abate this violation immediately and to cease and desist from further violation.

Failure to comply with the provisions of this Citation and Order of Abatement within 30 days of receipt may result in further legal action.